

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

RYAN SCOVILLE,

Plaintiff,

v.

Case No. 2:22-cv-00091-NJ

UNITED STATES DEPARTMENT STATE,

Defendant.

**JOINT MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Plaintiff Ryan Scoville and Defendant U.S. Department of State (collectively, the “Parties”) respectfully move for entry of a Protective Order agreed to by the Parties and submitted herewith.

Good cause exists for entry of the Protective Order. *See* Civil L. R. 26(e)(1). This case involves, *inter alia*, allegations that the State Department has an impermissible policy or practice of delay in responding to Freedom of Information Act (“FOIA”) requests under 5 U.S.C. § 552. The Court denied Defendant’s motion to dismiss the policy or practice claim. Discovery on this claim may require Defendant to produce information that it may not produce under the Privacy Act of 1974, 5 U.S.C. § 552a, without a court order. Discovery may also involve proprietary, private, and confidential information of the Parties and proprietary, private, and confidential information concerning non-parties. Entry of the Protective Order is therefore necessary to protect the Parties and non-parties in this litigation.

Agreed to by counsel for the Parties:

On February 9, 2023 for Plaintiff:

By: s/ Brady Williamson  
Brady C. Williamson  
GODFREY & KAHN, S.C.  
State Bar No. 1013896  
One East Main Street, Suite 500  
Madison, WI 53703  
Tel: (608) 257-3911  
bwilliam@gklaw.com

By: s/ Rachel Davidson  
Rachel Davidson  
MEDIA FREEDOM & INFORMATION  
ACCESS CLINIC  
YALE LAW SCHOOL  
P.O. Box 208215  
New Haven, CT 06520  
Tel: (617) 800-7842  
Rachel.Davidson@yale.edu

On February 9, 2023, for the Defendant:

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

MARCIA BERMAN  
Assistant Director, Federal Programs Branch

s/ Carol Federighi  
CAROL FEDERIGHI  
Senior Trial Counsel  
United States Department of Justice  
Civil Division, Federal Programs Branch  
P.O. Box 883  
Washington, DC 20044  
Phone: (202) 514-1903  
Email: carol.federighi@usdoj.gov